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Attorneys for Defendants First Transit and Firstgroup.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

LISA MCADAMS,

Plaintiff,

v.

FIRST TRANSIT, INC. and FIRSTGROUP
AMERICA, INC.,

Defendants.

Case No.

NOTICE OF REMOVAL

(Demand for Jury Trial)

TO: THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that defendants First Transit, Inc. and FirstGroup America, Inc., hereby remove to this court the state court action described below:

- 1) On June 22, 2016, an action was filed in the Circuit Court of the State of Oregon for the County of Washington, entitled *Lisa McAdams v. First Transit, Inc. and FirstGroup America, Inc.*, Case No. 16CV19705. A copy of the complaint is attached hereto as Exhibit A.

- 2) Removal is timely in that First Transit was served with plaintiff's complaint on June, 23, 2016. A copy of the affidavit of service on First Transit is attached as Exhibit B.
- 3) This action is a civil action over which this court has original jurisdiction pursuant to 28 U.S.C. § 1332, and that may be removed to this court by FirstGroup and First Transit pursuant to the provisions of 28 USC § 1446(b).
 - a. At all relevant times, plaintiff, Lisa Adams was a resident of Oregon.
 - b. At all relevant times, FirstGroup was a Delaware Corporation with its principal place of business in Ohio.
 - c. At all relevant times, First Transit was a Delaware Corporation with its principal place of business in Ohio.
 - d. First Transit and FirstGroup both consent to removal.
 - e. Plaintiff seeks \$99,557.47 in damages.

DATED this 21st day of July, 2016.

COSGRAVE VERGEER KESTER LLP

s/ Robert E. Barton

Robert E. Barton, OSB No. 814637
Telephone: 503-323-9000
Fax: (503) 323-9019
Of Attorneys for Defendants

Trial Attorney: Robert E. Barton

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing **NOTICE OF REMOVAL** on the date indicated below by:

- ☒ mail with postage prepaid, deposited in the US mail at Portland, Oregon,
- ☐ hand delivery,
- ☐ facsimile transmission,
- ☐ overnight delivery,
- ☐ email,
- ☐ electronic filing notification.

If served by facsimile transmission, attached to this certificate is the printed confirmation of receipt of the document(s) generated by the transmitting machine. I further certify that said copy was placed in a sealed envelope delivered as indicated above and addressed to said attorney(s) at the address(es) listed below:

Susan M. Muzik
Attorney at Law
888 SW Fifth Ave., Ste. 650
Portland, OR 97204
Of Attorneys for Plaintiff

DATED: July 21, 2016

s/ Robert E. Barton

Robert E. Barton